

Kathryn E. Leonard
Corporate Counsel



Koppers Inc
436 Seventh Avenue
Pittsburgh, PA 15219-1800
Tel 412 227 2456
Fax 412 227 2935
LeonardKE@koppers.com
www.koppers.com

October 13, 2016

VIA OVERNIGHT MAIL

Ben Banipal
P E , Branch Chief
Technical and Enforcement Branch
Superfund Division
United States Environmental Protection Agency
Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

RECEIVED
16 OCT 17 PM 2:19
SUPERFUND DIV.
DIRECTOR'S OFFICE

**Subject: SBA Shipyard Superfund Site, Jennings, Jefferson Davis Parish, Louisiana
CERCLIS #: LAD008434185; General Notice Letter**

Dear Mr. Banipal:

Koppers Inc. ("Koppers") received the enclosed General Notice Letter addressed to "Koppers Company Inc., c/o Beazer East Inc " on October 11, 2016 at Koppers' offices located at 436 Seventh Avenue, Pittsburgh, Pennsylvania 15219. This General Notice Letter was sent to our address in error.

On December 28, 1988, Koppers purchased certain assets from Koppers Company, Inc. (now known as Beazer East, Inc) ("Beazer"). However, Koppers is and always has been a distinct, unaffiliated legal entity from Beazer. Beazer no longer resides at 436 Seventh Avenue, Pittsburgh, Pennsylvania 15219. Please remove Koppers from your list of contacts for this matter.

Please call me at (412) 227-2456 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathryn E. Leonard". The signature is fluid and cursive, with a large loop at the end.

Kathryn E. Leonard

Enclosure

cc: Mr. Chuck Talton (via e-mail at talton.chuck@epa.gov)
Ms. I-Jung Chiang (via e-mail at chiang.i-jung@epa.gov)





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS TX 75202-2733

RECEIVED

OCT 11 2016

OCT 04 2016

CERTIFIED MAIL: RETURN RECEIPT REQUESTED, #9590 9401 0007 5205 8868 95

GENERAL NOTICE LETTER

URGENT LEGAL MATTER - PROMPT REPLY NECESSARY

Koppers Company Inc.
c/o Beazer East Inc.
Jill M. Blundon
Registered Agent for Beazer East Inc.
436 Seventh Ave.
Pittsburgh, Pennsylvania 15219

**Re: SBA Shipyard Superfund Site, Jennings, Jefferson Davis Parish, Louisiana;
CERCLIS #: LAD008434185; General Notice Letter**

Dear Madam/Sir:

The purpose of this letter is to provide Koppers Company Inc (hereinafter is referred to as "Koppers Company Inc." "you" or "your"), with written notice of your potential liability at the SBA Shipyard Superfund Site ("Site") located in Jennings, Jefferson Davis Parish, Louisiana. Information available to the U S Environmental Protection Agency ("EPA" or the "Agency") indicates that Koppers Company Inc may be responsible for the cleanup or costs of cleanup of the contamination found at the Site under the Comprehensive Environmental Response, Liability, and Compensation Act ("CERCLA")

Under CERCLA, the EPA is responsible for responding to the release or threat of release of hazardous substances, pollutants or contaminants into the environment – that is, for stopping further contamination from occurring and for cleaning up or otherwise addressing any contamination that has already occurred. The EPA has documented that such a release or threat or release has occurred at the SBA Shipyard Superfund Site. The EPA has spent public funds to investigate and control releases of hazardous substances or potential releases of hazardous substances at the Site

Explanation of Potential Liability

Under Sections 106(a) and 107(a) of CERCLA, 42 U.S.C. §§ 9606(a) and 9607(a), potentially responsible parties ("PRPs") may be required to perform cleanup actions to protect the public health and welfare or the environment. PRPs may also be responsible for costs incurred by the EPA in cleaning up the Site. PRPs include current and former owners and operators of the Site, as well as persons who sent or transported hazardous substances to the Site for disposal or treatment or who arranged for the disposal or treatment of hazardous substances at the Site.

Based on the information collected, the EPA believes that Koppers Company Inc. may be liable under Section 107(a) of CERCLA, with respect to the SBA Shipyard Superfund Site, as an arranger, who by contract or agreement, arranged for the disposal, treatment, or transportation of hazardous substances at the Site.

Site History

The Site is situated on approximately 98 acres of land located in a rural-industrial area at 9040 Castex Landing Road, Jennings, Jefferson Davis Parish, Louisiana 70546. The Site is within Section 19 of Range 2W, Township 105 and is located at the end of Louisiana Highway 3166) which is on the west bank of the Mermentau River. The Site is approximately four miles southeast of downtown Jennings and two miles southwest of the village of Mermentau. The Site is bordered to the north by residents, south and west by wetlands, and east by the Mermentau River and wetlands.

The Site primarily consists of two separately-owned parcels of property, one southern and one northern. The southern and northern properties are generally divided by a property line that runs just north of the large barge slip. Suzanne Smaihall Cornelius, (heir of Louis Smaihall, principal of SBA Shipyards, Inc.) and SBA Shipyards, Inc. (now inactive) own the southern property, which historically was operated as a barge cleaning operation. Bunge Street Properties, LLC, f/k/a Leevac Shipyards, Inc., owns the northern property, which historically was operated as a vessel construction and repair operation.

SBA Shipyards, Inc. ("SBA") began operations at the Site on about 1965. Initially, it performed vessel construction and repair operations on what is now the northern parcel. In the 1970s, SBA constructed the graving dock on the northern parcel and dredged the barge slip and constructed the barge cleaning facility on what is now the southern parcel. Leevac Shipyards, Inc. ("Leevac") entered into a lease with option to purchase for the northern vessel construction and repair facility with SBA in 1993. Leevac operated vessel construction and repair operations on the northern parcel beginning in 1993. Leevac then exercised its option to purchase in 1998 and acquired the northern parcel at that time and continued its operations. SBA continued to operate its barge cleaning operations on the southern parcel up until approximately 2006, when Mr. Smaihall died.

Vessel construction and repair utilized two launch slips with on-land rails to haul and launch vessels and eventually a graving dock with a moving gate where a vessel could enter and the dock de-watered to allow construction and repairs on dry land. Both SBA and Leevac activities included sandblasting, cutting and painting, as well as fabricating and repairing vessels. Barge cleaning operations were conducted by SBA only on the southern parcel. SBA converted a small barge placed on land adjacent to the barge slip into its "boiler barge," which it used to generate steam for use in cleaning barges and it also served as the barge cleaning control room.

SBA cleaned barges and other vessels that had contained as last cargos a variety of materials, including, but not limited to: acrylates, asphalt, carbon tetrachloride, coal tar, coke oven tar, carbon black, carbon oil, , caustic soda, creosote, cumene, black oil and black oil slop, bunker crude, diesel fuel, heavy grease, waste water, ethyl acrylates, kerosene, lube oil, methanol, number 6 oil , rust, scale, styrene, sour gas oil, soy bean oil, sulphuric acid, tallow, and vinyl acetate.

SBA used a large partially buried barge, as well as above-grade tanks constructed from cut-up barges, to store liquids, sludges, solids and other materials during the barge cleaning process. SBA also constructed and used an unlined surface impoundment called the Oil Pit to store liquids, sludges, solids and other materials. Aside from the Oil Pit, SBA used three other unlined surface impoundments, called Water Pits 1, 2 and 3, to receive wastewater, sludges and solids from the barge cleaning process.

In December 10, 2002, EPA entered into an Order and Agreement for Interim Measures/Removal Action (IM/RA) of Hazardous/Principal Threat Wastes at SBA Shipyards, Inc., Docket No. RCRA-6-2002-0908, pursuant to RCRA Section 3008(h) ("2002 Order/Agreement") with SBA and SSIC Remediation, LLC ("SSIC"), an entity formed by certain former customers of SBA's barge cleaning operations to conduct this work. Interim removal activities were conducted from March 2001 through January 2005 under the 2002 Order/Agreement. Interim removal activities consisted of the removing, solidifying, and recycling and/or disposing off-site the waste in the Oil Pit and Water Pit 2 and then over-excavation of the Oil Pit and Water Pit 2; removal and scrapping of above ground storage tanks; draining and refilling of Water Pit 3; removing all pumpable materials from the partially buried barge and disposing those materials off-site, then welding shut all hatches to that barge; and surface scrapping of all visible materials from a former land treatment unit (FLTU). By letter dated February 24, 2006, EPA Region 6's RCRA branch reviewed and approved the completion report of the IM/RA activities and concluded that the completion report fulfilled the 2002 Order/Agreement. The IM/RA, however, was intended as an interim response; hazardous substance remained onsite after the IM/RA.

In October 2012, the U.S. Coast Guard and the LDEQ responded to a reported release at the barge cleaning portion of the Site from an attempt to scrap the "boiler barge" and the partially buried storage barge by parties contracted by the owner of the southern portion of the Site. During 2014 to 2015, EPA conducted a CERCLA emergency removal action and an Oil Pollution Act of 1990 removal action after LDEQ reported barge scrapping activities and releases of visible liquids at the Site.

Between December 2012 and September 2014, EPA conducted a preliminary assessment, site inspection, and expanded site inspection. As part of EPA activities, the Agency conducted sampling activities at the Site. During those site activities, EPA sampling documented releases or threats of releases of hazardous substances in the subsurface and groundwater of the Site, the Mermentau River, and wetlands surrounding the Site. Numerous hazardous substances were identified at the Site including petroleum hydrocarbons, numerous polycyclic aromatic hydrocarbons, dioxins/furans, metals, and volatile organic compounds. Petroleum and non-petroleum substances found at portions of the Site are or were comingled.

Information to Assist You

The EPA would like to encourage communication between you, other PRPs, and EPA at the Site. The EPA is in the process of negotiating a remedial investigation/feasibility study administrative settlement and order on consent ("ASAOC") for the Site with some of the potentially responsible parties. If you'd like to discuss the opportunity to join this ongoing settlement, please contact counsel representing the group of potentially responsible parties below within **30 days** of receipt of this Notice Letter:

Michael A. Chernekoff
Partner
Jones Walker LLP
1001 Fannin St., Ste. 2450
Houston, Texas 77002
(713) 437-1827
mchernekoff@joneswalker.com

We encourage you to give this matter your immediate attention and request. The EPA plans to finalize the ASAOC after the 30-day response period for this General Notice. If you choose not to join the ongoing settlement discussions or pursue other options to satisfy your potential liability with the EPA, the EPA will evaluate enforcement options, including issuing special notice letters to all potentially liable parties known to the EPA at that time.

Also included in this letter to assist you are: the evidentiary documents as Enclosure A; the Small Business Resource Fact Sheet as Enclosure B; and the parties receiving this letter as Enclosure C.

Financial Concerns/ Ability-to-Pay Settlements

The EPA is aware that the financial ability of some PRPs to contribute toward the payment of response costs at a site may be substantially limited. In accordance with Section 122(g)(7) of CERCLA, 42 U.S.C. § 9622(g)(7), the EPA will review financial information that you submit in order to determine whether you have an inability or a limited ability to pay response costs incurred at the Site. As part of this review, the EPA will take into consideration your overall financial condition and demonstrable constraints on your ability to raise revenue. Based upon the financial information that you may submit, EPA will determine whether it can qualify for a reduction in the settlement amount and/or an alternative payment method within the meaning of Section 122(g)(7) of CERCLA, 42 U.S.C. § 9622(g)(7).

If you believe that you qualify for a reduction in any settlement amount and/or alternative payment amount under the criteria described in the paragraphs above, please contact Mr. Taltón, at 214-665-7475 for information on "Ability to Pay Settlements." In response, you will receive a package of information about the potential for such settlements and an information request for your relevant financial information, and you will be asked to submit financial records including business federal income tax returns. If the EPA concludes that you have a legitimate inability to pay the full amount of the response costs, the EPA may offer a schedule for payment over time or a reduction in the total amount demanded from you.

Also, please note that because the EPA has a potential claim against you, if your financial status changes in any significant way, e.g., filing for bankruptcy, you must include the EPA as a creditor. The EPA reserves the right to file a proof of claim or an application for reimbursement of administrative expenses.

Resources and Information for Small Businesses

As you may be aware, on January 11, 2002, President Bush signed into law the Superfund Small Business Liability Relief and Brownfields Revitalization Act. This Act contains several exemptions and defenses to CERCLA liability, which we suggest that all parties evaluate. You may download a copy of the law at <http://www.gpo.gov/fdsys/pkg/PLAW-107publ118/pdf/PLAW-107publ118.pdf> and review the EPA guidances regarding these exemptions at <http://cfpub.epa.gov/compliance/resources/policies/cleanup/superfund/>.

The EPA has created a number of helpful resources for small businesses. The EPA has established the National Compliance Assistance Clearinghouse as well as Compliance Assistance Centers which offer various forms of resources to small businesses. You may inquire about these resources at <http://www.epa.gov/compliance/compliance-assistance-centers>. In addition, the EPA Small Business Ombudsman may be contacted at <http://www.epa.gov/resources-small-businesses/forms/contact-us-about-resources-small-businesses>. Finally, the EPA has developed a fact sheet about the Small Business Regulatory Enforcement Fairness Act (SBREFA) and information on resources for small businesses, which is enclosed with this letter as Enclosure B and available on the Agency's website at <http://www.epa.gov/compliance/small-business-resources-information-sheet>.

Thank you in advance for your cooperation. We look forward to working closely with you in the future. If you have any questions regarding the notice or any of the documentation included, please contact Mr. Talton at 214-665-7475 or talton.chuck@epa.gov. Questions concerning legal matters should be directed to the EPA site attorney, Ms. I-Jung Chiang, at 214-665-2160 or chiang.i-jung@epa.gov. Thank you for your attention to this matter.

Sincerely yours,



Ben Banipal, P.E., Branch Chief
Technical and Enforcement Branch
Superfund Division

Enclosures:

- A Evidentiary Documents
- B Small Business Resource Fact Sheet
- C Parties Receiving General Notice letter

CC:

Koppers Company Inc.
c/o Beazer East Inc.
99 Wood Ave. South
Iselin, New Jersey 08830

Koppers Company Inc.
c/o Beazer East Inc.
1910 Cochran Rd., Suite 200
Pittsburgh, Pennsylvania 15220

ENCLOSURE A

**SBA SHIPYARD SUPERFUND SITE
JENNINGS, JEFFERSON DAVIS PARISH, LOUISIANA
GENERAL NOTICE LETTER**

EVIDENTIARY DOCUMENTATION

Invoices and/or Marine Chemist Certificates

Dravo Mechling

Billing Memorandum

TO: Koppers Company

DATE 3/19/85

INVOICE NO. _____

ACCOUNT NO. _____

attn: Mr. James Cafaro

PREPARED BY DTM

To bill your account for the cost incurred to clean and internally coil barge D M 953 (SBA Shipyard invoice attached)	\$35423.00
--	------------

Per Diem charges 0700 2/1/85 to 0700 3/8/85 \$	
--	--

35 days @ \$125	4375.00
-----------------	---------

Total	39798.00
-------	----------



S. B. A. SHIPYARDS, INC.

P. O. Box 1386

JENNING, LOUISIANA 70546

PHONE (318) 824-1519

TANK BARGE "D M 948
and/or charters and/or owners
KOPPERS COMPANY, INC.
850 KOPPERS BUILDING
PITTSBURGH, PA. 15219
ATT: MR JIM CAFARO

INVOICE NO. 6 - 7 (87)
WORK ORDER NO. 1004
DATE JUNE 19 19 87
P. O. NO. 057-S-173

RED LETTER CLAUSE

We contract only upon the following terms, applicable to every contract: In the case of a vessel we have a lien upon the vessel for our bill; all time contracts are subject, without responsibility on our part, to delay in case of strike, labor difficulties, fire or causes beyond our control; or liability in case of defective workmanship or material is limited strictly to the proper replacement thereof. In respect of loss and/or damage to the vessel, we will not be responsible unless reported in writing within sixty days of delivery. This is in lieu of all other warranty.

Furthermore, we undertake to perform work on vessels and provide berth, warpage, towage and other services and facilities only upon condition that we shall not be liable in respect to any one vessel, directly or indirectly in contract, tort or otherwise, to its owners, charterers or underwriters for any injury to such vessel, its cargo, equipment or movable stores, or for any consequences thereof, unless such injury is caused by our negligence or the negligence of our employees and in no event shall our aggregate liability to all such parties in interest for damage sustained by them, as a result of such injury, exceed the sum of \$300,000.00.

"In connection with the accident and/or indemnity and/or insurance clauses, if any, contained in your specifications relating to liability for personal injuries, please note that we do not agree to same, insofar as they undertake to impose any liability or any obligations to take out or maintain insurance beyond the liabilities or the obligations to insure imposed upon us by law."

WE INVOICE YOUR ACCOUNT FOR CLEANING TANK
BARGE "DM 948" AND FURNISHING GAS FREE
CERTIFICATE AS PER INSTRUCTIONS AND AS
PER SHEET ATTACHED -- -- -- -- -- \$ 29,679.30

checked by

[Signature]

Hand - 7/24/87

TANK BARGE "D.M. 948"
and/or charters and/or owners
KOPPERS COMPANY, INC.
850 KOPPERS BUILDING
PITTSBURGH, PA. 15219

ATTENTION: MR. JIM CAFARO

As per instructions from Mr. Jessie Sandlin - Dravo Mechling
Inc, New Orleans, La., we invoice you for cleaning and gas
free certificate for subject barge D.M.948 as follows:

1. Gas free and clean safe for men, safe for fire 195' x 35'
x 15' double skin coal tar tank barge. Products in main
tanks 2 to 4' deep, corners and behind pipe lines. Butter
worth and wash oil residue from product then shovel to
buckets and remove with crane in fabricated pipe container
to shore, chemical and rewash tanks after removing heavy
residue. Drop valve suctions to check pipe line for products
and replace. Wash and clean interbottom and wing tanks
containing products.

1228 man hours @ \$ 18.00 per man hour- - - - - \$ 22,104.00

Chemicals, diesel, boiler fuel, protective clothing,
and crane service- - - - - 6,162.00

TOTAL LABOR AND MATERIAL - - - - - \$ 28,266.00

5% state and parish sales tax - - - - - 1,413.30

INVOICE AMOUNT DUE- - - - - \$ 29,679.30

cc: Mr Jessie Sandlin
Dravo Mechling corp
New Orleans, La.



S. B. A. SHIPYARDS, INC.

P. O. BOX 1386

JENNINGS, LOUISIANA 70546

PHONE (318) 824-1519

TANK BARGE "D M 932"
and/or owners and/or charters
KOPPERS CO. INC.
850 KOPPERS BLDG
PITTSBURGH, PA. 15219

Att: Mr. Jim Cafaro

INVOICE NO. 7 - 4 (87)

WORK ORDER NO. 1008

DATE JULY 28TH 1987

P. O. NO. D.M. P/O#077-S048

RED LETTER CLAUSE

We contract only upon the following terms, applicable to every contract; in the case of a vessel we have a lien upon the vessel for our bill; all time contracts are subject, without responsibility on our part, to delay in case of strike, labor difficulties, fire or causes beyond our control; or liability in case of defective workmanship or material is limited strictly to the proper replacement thereof. In respect of loss and/or damage to the vessel, we will not be responsible unless reported in writing within sixty days of delivery. This is in lieu of all other warranty.

Furthermore, we undertake to perform work on vessels and provide berth, warpage, towage and other services and facilities only upon condition that we shall not be liable in respect to any one vessel, directly or indirectly in contract, tort or otherwise, to its owners, charterers or underwriters for any injury to such vessel, its cargo, equipment or movable stores, or for any consequences thereof, unless such injury is caused by our negligence or the negligence of our employees and in no event shall our aggregate liability to all such parties in interest for damage sustained by them, as a result of such injury, exceed the sum of \$300,000.00.

"In connection with the accident and/or indemnity and/or insurance clauses, if any, contained in your specifications relating to liability for personal injuries, please note that we do not agree to same, insofar as they undertake to impose any liability or any obligations to take out or maintain insurance beyond the liabilities or the obligations to insure imposed upon us by law."

1. Shift vessel from river to cleaning facility south side of yard. Gas free and clean. 195 x 35 x 15' double skin tank barge, safe for men and safe for fire. Clean for change of cargo, including removing suction drops, cleaning cargo lines, approximately 40 bbls of solidified products from 3 main cargo tanks. Chemical wash and chip products from sumps.	
485 man hours @ \$ 18.00 per man hour - - - - -	\$ 8,730.00
Cleaning chemical, diesel, boiler fuel, protective clothing and crane service - - - - -	4,682.00
2. Gas free chemist certificate - - - - -	250.00
TOTAL LABOR AND MATERIAL - - - - -	\$ 13,662.00
5% STATE AND PARISH SALES TAX - - - - -	683.10
INVOICE AMOUNT DUE - - - - -	\$ 14,345.10

Checked By

CC: Mr. Jessie Sandlin



B. A. SHIPYARDS, INC.

P. O. Box 1386

JENNINGS, LOUISIANA 70546

PHONE (318) 824-1519

G.L. 871

TANK BARGE "J.A.R. 12"
and/or owners and/or charters
KOPPERS COMPANY
850 KOPPERS BUILDING
PITTSBURGH, PA. 15219

ATT: MR. JIM CAFARO

INVOICE NO. 6-10 (88)

WORK ORDER NO. 1048

DATE JUNE 30TH 1988

P. O. NO.

RED LETTER CLAUSE

We contract only upon the following terms, applicable to every contract: In the case of a vessel we have a lien upon the vessel for our bill; all time contracts are subject, without responsibility on our part, to delay in case of strike, labor difficulties, fire or causes beyond our control; or liability in case of defective workmanship or material is limited strictly to the proper replacement thereof. In respect of loss and/or damage to the vessel, we will not be responsible unless reported in writing within sixty days of delivery. This is in lieu of all other warranty.

Furthermore, we undertake to perform work on vessels and provide berth, warpage, towage and other services and facilities only upon condition that we shall not be liable in respect to any one vessel, directly or indirectly in contract, tort or otherwise, to its owners, charterers or underwriters for any injury to such vessel, its cargo, equipment or movable stores, or for any consequences thereof, unless such injury is caused by our negligence or the negligence of our employees and in no event shall our aggregate liability to all such parties in interest for damage sustained by them, as a result of such injury, exceed the sum of \$300,000.00.

"In connection with the accident and/or indemnity and/or insurance clauses, if any, contained in your specifications relating to liability for personal injuries, please note that we do not agree to same, insofar as they undertake to impose any liability or any obligations to take out or maintain insurance beyond the liabilities or the obligations to insure imposed upon us by law."

We invoice your account for cleaning and gas freeing your tank barge J.A.R. 12 as directed by Mr. Jessie Sandlin-National marine of New Orleans.

1. Shift barge, river to cleaning plant, clean barge, safe for men and safe for fire, including wings, double bottom, rake tanks, steam coils, pipe lines and pump. Butter worth, pick up and bucket out 130 bbls of hard and soft residue left, re-butterworth as required, pick up and wash wings and bottoms.

613 man hours @ \$18.00 per man hour \$ 11,034.00

Chemical, boiler fuel, diesel,
protective clothing and crane time
removing and emptying bbls 2,461.00

2. Gas free chemist certificate-safe for men and safe for fire including Benzine check 300.00

CHARGES AUDITED
<i>goc</i>
OK FOR PAYMENT
DATE 7-7-88

TOTAL LABOR, EQUIPMENT & MATERIALS \$ 13,795.00

6% STATE AND PARISH SALES TAX 827.70

INVOICE AMOUNT DUE \$ 14,622.70

checked by *[Signature]*

ENCLOSURE B

**SBA SHIPYARD SUPERFUND SITE
JENNINGS, JEFFERSON DAVIS PARISH, LOUISIANA
GENERAL NOTICE LETTER**

SMALL BUSINESS RESOURCES FACT SHEET



Office of Enforcement and Compliance Assurance
INFORMATION SHEET

U. S. EPA Small Business Resources

If you own a small business, the United States Environmental Protection Agency (EPA) offers a variety of compliance assistance and tools to assist you in complying with federal and state environmental laws. These resources can help you understand your environmental obligations, improve compliance and find cost-effective ways to comply through the use of pollution prevention and other innovative technologies.

Hotlines, Helplines and Clearinghouses

EPA sponsors approximately 89 free hotlines and clearinghouses that provide convenient assistance regarding environmental requirements.

The National Environmental Compliance Assistance Clearinghouse provides quick access to compliance assistance tools, contacts, and planned activities from the U.S. EPA, states, and other compliance assistance providers.
www.epa.gov/clearinghouse

Pollution Prevention Clearinghouse
www.epa.gov/opptintr/library/ppicindex.htm

EPA's Small Business Ombudsman Hotline provides regulatory and technical assistance information.
(800) 368-5888

Emergency Planning and Community Right-To-Know Act
(800) 424-9346

National Response Center (to report oil and hazardous substance spills)
(800) 424-8802

Toxics Substances and Asbestos Information
(202) 554-1404

Safe Drinking Water
(800) 426-4791

Stratospheric Ozone Refrigerants Information
(800) 296-1996

Clean Air Technology Center
(919) 541-0800

Wetlands Helpline
(800) 832-7828

EPA Websites

EPA has several Internet sites that provide useful compliance assistance information and materials for small businesses. If you don't have access to the Internet at your business, many public libraries provide access to the Internet at minimal or no cost.

EPA's Home Page
www.epa.gov

Small Business Assistance Program
www.epa.gov/ttn/sbap

Compliance Assistance Home Page
www.epa.gov/compliance/assistance

Office of Enforcement and Compliance Assurance
www.epa.gov/compliance

Small Business Ombudsman
www.epa.gov/sbo

Innovative Programs for Environmental Performance
www.epa.gov/partners

Compliance Assistance Centers

In partnership with industry, universities, and other federal and state agencies, EPA has established Compliance Assistance Centers (Centers) that provide information targeted to industries with many small businesses. All Centers can be accessed at <http://www.assistancecenters.net>

Metal Finishing

(1-800-AT-NMFC or www.nmfc.org)

Printing

(1-888-USPNEAC or www.pneac.org)

Automotive Service and Repair

(1-888-GRN-LINK or www.ccar-greenlink.org)

Agriculture

(1-888-663-2155 or www.epa.gov/agriculture)

Printed Wiring Board Manufacturing

(1-734-995-4911 or www.pwbrc.org)

Chemical Industry

(1-800-672-6048 or www.chemalliance.org)

Transportation Industry

(1-888-459-0656 or www.transource.org)

Paints and Coatings

(1-800-286-6372 or www.paintcenter.org)

Construction Industry

(www.cicacenter.org)

Automotive Recycling Industry

(www.ecarcenter.org)

US / Mexico Border Environmental Issues

(www.bordercenter.org)

State Agencies

Many state agencies have established compliance assistance programs that provide on-site and other types of assistance. Contact your local state environmental agency for more information or call EPA's Small Business Ombudsman at (800)-368-5888 or visit the Small Business Environmental Homepage at <http://www.smallbiz-enviroweb.org>

Compliance Incentives

EPA provides incentives for environmental compliance. By participating in compliance assistance programs or voluntarily disclosing and promptly correcting violations before an enforcement action has been initiated, businesses may be eligible for penalty waivers or reductions. EPA has two policies that potentially apply to small businesses. The Small Business Policy (<http://www.epa.gov/compliance/incentives/smallbusiness>) and

Audit Policy (<http://www.epa.gov/compliance/incentives/auditing>)

Commenting on Federal Enforcement Actions and Compliance Activities

The Small Business Regulatory Enforcement Fairness Act (SBREFA) established an ombudsman ("SBREFA Ombudsman") and 10 Regional Fairness Boards to receive comments from small businesses about federal agency enforcement actions. The SBREFA Ombudsman will annually rate each agency's responsiveness to small businesses. If you believe that you fall within the Small Business Administration's definition of a small business (based on your North American Industry Classification System (NAICS) designation, number of employees or annual receipts, defined at 13 C.F.R. 121.201, in most cases, this means a business with 500 or fewer employees), and wish to comment on federal enforcement and compliance activities, call the SBREFA Ombudsman's toll-free number at 1-888-REG-FAIR (1-888-734-3247).

Every small business that is the subject of an enforcement or compliance action is entitled to comment on the Agency's actions without fear of retaliation. EPA employees are prohibited from using enforcement or any other means of retaliation against any member of the regulated community because the regulated community previously commented on its activities.

Your Duty to Comply

If you receive compliance assistance or submit comments to the SBREFA Ombudsman or Regional Fairness Boards, you still have the duty to comply with the law, including providing timely responses to EPA information requests, administrative or civil complaints, other enforcement actions or communications. The assistance information and comment processes do not give you any new rights or defenses in any enforcement action. These processes also do not affect EPA's obligation to protect public health or the environment under any of the environmental statutes it enforces, including the right to take emergency remedial or emergency response actions when appropriate. Those decisions will be based on the facts in each situation. The SBREFA Ombudsman and Fairness Boards do not participate in resolving EPA's enforcement actions. Also, remember that to preserve your rights, you need to comply with all rules governing the enforcement process.

EPA is disseminating this information to you without making a determination that your business or organization is a small business as defined by Section 222 of the Small Business Regulatory Enforcement Fairness Act (SBREFA) or related provisions.

ENCLOSURE C

**SBA SHIPYARD SUPERFUND SITE
JENNINGS, JEFFERSON DAVIS PARISH, LOUISIANA
PARTIES RECEIVING GENERAL NOTICE LETTER**

Allied Towing
c/o Allied Towing Service LLC
Francis J. Lobrano
Registered Agent for Allied Towing Service LLC
147 Keating Dr.
Belle Chasse, Louisiana 70037

Allied Towing
c/o Allied Towing Service LLC
12608 Hwy 23
Belle Chasse, Louisiana 70037

Koppers Company Inc.
c/o Beazer East Inc.
Jill M. Blundon
Registered Agent for Beazer East Inc.
436 Seventh Ave.
Pittsburgh, Pennsylvania 15219

Koppers Company Inc.
c/o Beazer East Inc.
99 Wood Ave. South
Iselin, New Jersey 08830

Koppers Company Inc.
c/o Beazer East, Inc.
1910 Cochran Rd., Suite 200
Pittsburgh, Pennsylvania 15220

Higman Marine Service
c/o Higman Services Corporation
CT Corporation System
Registered Agent for Higman Services Corporation
5615 Corporate Blvd., Suite 400B
Baton Rouge, Louisiana 70808

Higman Marine Service
c/o Higman Services Corporation
Attn: Legal Department
1980 Post Oak Blvd., Suite 1101
Houston, Texas 77056

Ingram Barge Co.
CT Corporation System
Registered Agent for Ingram Barge Co.
5615 Corporate Blvd., Suite 400B
Baton Rouge, Louisiana 70808

Ingram Barge Co.
4400 Harding Road
Nashville, Tennessee 37205

Hall-Buck Marine
c/o Kinder Morgan Bulk Terminals Inc.
CT Corporation System
Registered Agent for Kinder Morgan Bulk Terminals Inc.
5615 Corporate Blvd., Suite 40B
Baton Rouge, Louisiana 70808

Hall-Buck Marine
c/o Kinder Morgan Bulk Terminals Inc.
Attn: Legal Department
7116 Hwy 22
Sorrento, Louisiana 70778

Hollywood Marine Inc.,
c/o Kirby Inland Marine, LP
Registered Agent
d/b/a CSC-Lawyers Incorporating Service Company
211 E. 7th Street, Suite 620
Austin, Texas 78701-3136

Hollywood Marine Inc.
c/o Kirby Inland Marine LP
Corporation Service Co.
Registered Agent for Kirby Inland Marine LP
320 Somerulos St.
Baton Rouge, Louisiana 70802-6129

Hollywood Marine Inc.
c/o Kirby Inland Marine LP
Attn: Legal Department
55 Waugh Dr., Suite 1000
Houston, Texas 77007

Steuart Transportation Company
Registered Agent
National Registered Agents, Inc., of MD
351 W. Camden Street
Baltimore, Maryland 21201

Steuart Transportation Company
5454 Wisconsin Avenue, Suite 1600
Chevy Chase, Maryland 20815

Sabine Towing
c/o Sabine Towing & Transportation Co Inc.
CT Corporation System
Registered Agent for Sabine Towing & Transportation Co
Inc
5615 Corporate Blvd Suite 400B
Baton Rouge, Louisiana 70808

Sabine Towing & Transportation Co. Inc.
c/o Sequa Corporation
Attn: Legal Department
300 Blaisdell Rd.
Orangeburg, New York 10962

Sun Oil Company
c/o Sunoco, Inc
Corporation Service Company
Registered Agent for Sunoco, Inc
1703 Laurel Street
Columbia, SC 29201

Sun Oil Company
c/o Sunoco, Inc.
1735 Market Street, Suite LL
Philadelphia, Pennsylvania 19103

Sun Oil Company
c/o Sunoco, Inc
Kevin Dunleavy, Chief Counsel
Law Department,
1735 Market Street, Suite LL
Philadelphia, PA 19103

Sun Terminals of Louisiana
c/o Sunoco, Inc.
Corporation Service Company
Registered Agent for Sunoco, Inc
1703 Laurel Street
Columbia, SC 29201

Sun Terminals of Louisiana
c/o Sunoco, Inc.
1735 Market Street, Suite LL
Philadelphia, Pennsylvania 19103

Sun Terminals of Louisiana
c/o Sunoco, Inc
Kevin Dunleavy, Chief Counsel
Law Department
1735 Market Street, Suite LL
Philadelphia, PA 19103

State of Louisiana
Department of Transportation &
Development (DOTD)
P O Box 94245
Baton Rouge, Louisiana 70802

State of Louisiana
Department of Transportation &
Development (DOTD)
Brandon Brown, General Counsel
P O Box 94245
Baton Rouge, Louisiana 70802

State of Louisiana
Department of Transportation &
Development (DOTD)
Kevin Reed, Ferry Systems Engineer
P.O. Box 94245
Baton Rouge, Louisiana 70802

1 **Ensure there are no other shipping or tracking labels attached to your package.** Select the Print button on the print dialog box that appears. Note: If your browser does not support this function, select Print from the File menu to print the label.

2 **Fold the printed label at the solid line below.** Place the label in a UPS Shipping Pouch. If you do not have a pouch, affix the folded label using clear plastic shipping tape over the entire label.

3 **GETTING YOUR SHIPMENT TO UPS**
Customers with a Daily Pickup
Your driver will pickup your shipment(s) as usual.

Customers without a Daily Pickup

Take your package to any location of The UPS Store®, UPS Access Point™ location, UPS Drop Box, UPS Customer Center, UPS Alliances (Office Depot® or Staples®) or Authorized Shipping Outlet near you. Items sent via UPS Return Services(SM) (including via Ground) are also accepted at Drop Boxes. To find the location nearest you, please visit the Resources area of CampussShip and select UPS Locations.

Schedule a same day or future day Pickup to have a UPS driver pickup all your CampussShip packages.

Hand the package to any UPS driver in your area.
UPS Access Point™

MICRO DINER
221 SHILOH ST
PITTSBURGH, PA 15211

UPS Access Point™
THE UPS STORE
1735 E CARSON ST
PITTSBURGH, PA 15203

UPS Access Point™
MILLER ACE HARDWARE
237 BROWNSVILLE RD
PITTSBURGH, PA 15210

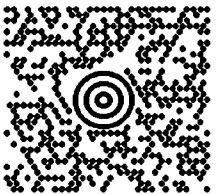
FOLD HERE

KATY LEONARD
KOPPERS- PITTSBURGH
436 7TH AVE
PITTSBURGH, PA 15219

0.0 LBS LTR 1 OF 1

SHIP TO:

BEN BANIPAL-SUPERFUND DIVISION
US ENVIRONMENTAL PROTECTION AGENCY
1445 ROSS AVENUE, SUITE 1200
REGION 6
DALLAS TX 75202-2750



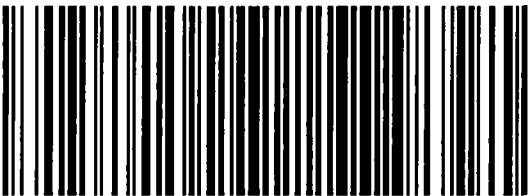
TX 752 9-33



UPS NEXT DAY AIR

TRACKING #: 1Z F1X 001 01 9091 8675

1



BILLING P/P

CS 18 5 48 WNTTE100 78 0A 07/2016



xpress Envelope

OS ENVIRONMENTAL PROTECTION

1445 RICH AVE

STE 1200

DALLAS TX 75202-2751

P: **YELLOWs: 333MG** L: **3W**

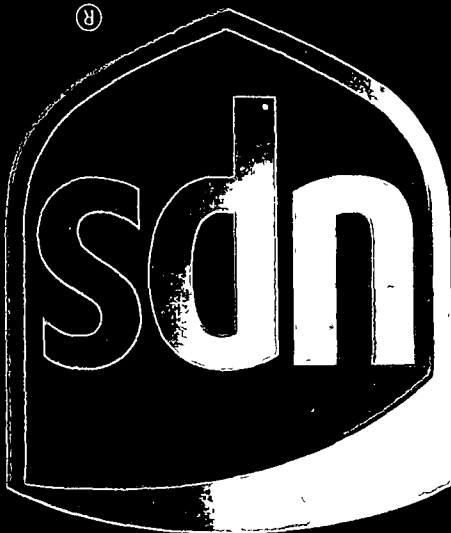
HCOX-RDL



1ZF1X001019091 **8675**

1030

SAT08485 Oct 17 08 21 58 2016
US 7522 HIPPS 16 3 5 SAT08485sL



Very Urgent

UPS Worldwide Express®
UPS 2nd Day Air®

s.com® or call 1-800-PICK-UPS® (1-800-742-5877)
Schedule a pickup or find a drop off location near you.

Shipments

For the Letter rate, UPS Express Envelopes may only contain
documents, urgent documents, and/or electronic media, and must
weigh 8 oz. or less. UPS Express Envelopes containing items other than
documents or weighing more than 8 oz. will be billed by weight.

International Shipments

UPS Express Envelope may be used only for documents of no commercial
value. Certain countries consider electronic media as documents. Visit
ups.com/importexport to verify if your shipment is classified as a document.

For the Letter rate, the UPS Express Envelope must weigh 8 oz. or less.
UPS Express Envelopes weighing more than 8 oz. will be billed by weight.

UPS Express Envelopes are not recommended for shipments of electronic media
containing sensitive personal information or breakable items. Do not send cash
or valuables.

**Insert shipping documents
under window from the top.**

Do not use this envelope for:

**UPS Ground
UPS Standard
UPS 3 Day Select®
UPS Worldwide Expedited®**

Window Envelope

Use this envelope with shipping documents printed from a laser
jet printer on plain paper.

Serving you for more than 100 years
United Parcel Service.



Shipping Notice — Carriage hereunder may be subject to the rules relating to liability and other terms and/or conditions established by the Convention for the Unification of Certain Rules Relating to International Carriage by Air (the "Warsaw Convention") and/or
the Convention for the International Carriage of Goods by Road (the "CMR Convention"). These commodities, technology or software were exported from the U.S. in accordance with the Export Administration Regulations. Diversion contrary to U.S. law prohibited.

010195103 4/14 PAC United Parcel Service